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Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

RACHEL ANNETTE GIANNONE,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:25-cv-1554-JDP

STIPULATION TO VOLUNTARY REMAND
PURSUANT TO SENTENCE FOUR OF 42
U.S.C. § 405(g); ~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, with the approval of the Court, that this action be remanded for further administrative proceedings pursuant to sentence four of 42 U.S.C. § 405(g).

On remand, the Commissioner will offer Plaintiff the opportunity for a hearing, take further action to develop the administrative record, as necessary, and issue a new decision.

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1 The parties further request that the Clerk of the Court be directed to enter a final
2 judgment in favor of Plaintiff, and against Defendant, reversing the final decision of the
3 Commissioner. Plaintiff's motion for summary judgment, ECF No. 13, is DENIED as moot.
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5 Respectfully submitted,

6 Dated: September 8, 2025

LAW OFFICES OF FRANCESCO BENAVIDES

7 By: /s/ Paul Sachelari*

8 PAUL SACHELARI

Attorneys for Plaintiff

[*As authorized by e-mail on Sept. 8, 2025]

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10 Dated: September 10, 2025

ERIC GRANT

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MATHEW W. PILE

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13
14 By: /s/ Margaret Branick-Abilla

MARGARET BRANICK-ABILLA

Special Assistant United States Attorney

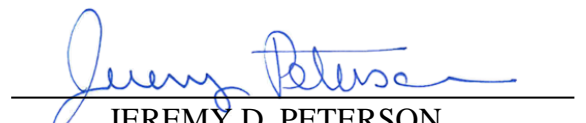
Attorneys for Defendant

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19 **ORDER**

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21 Pursuant to stipulation, IT IS SO ORDERED.

22 IT IS SO ORDERED.

23
24 Dated: September 10, 2025

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JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE